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February 6, 2006

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, DC 20554

**Re: Certification of CPNI Filing, February 6, 2006 (EB-06-TC-060)**  
**EB Docket No. 06-36**

Dear Ms. Dortch:

Broadwing Communications, LLC ("Broadwing") submits this certification and statement in response to the Public Notice of the Enforcement Bureau, dated January 30, 2006, concerning compliance with the Commission's customer proprietary network ("CPNI") rules. Broadwing takes very seriously its obligations to protect the privacy of its customers and to prevent the unauthorized use or disclosure of our customers' private information, including CPNI. The Company has therefore adopted operational procedures to assure that, consistent with the Commission's rules, the confidentiality of such information is protected from disclosure. This letter certifies that, based upon my actual personal knowledge, that the following describes the operational procedures and policies adopted by the Company to ensure the privacy of our customers' CPNI consistent with the Commission's rules.

I am aware of the media reports regarding release of subscriber information that gave rise to the Commission's January 30 Notice. I therefore want to assure the Commission that Broadwing does not sell or otherwise provide any of its customer information to unaffiliated third-parties, with or without the permission of our customers.



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With respect to the Commission's rules regarding use of CPNI by the Company for our own marketing purposes, until recently, Broadwing sold only interexchange services. Thus, the requirements of the CPNI rules restricting Broadwing from using CPNI to sell out-of-category, *i.e.*, local or CMRS, services had no impact on Broadwing's sales and marketing practices because we did not sell these services.

However, with the recent purchase of the competitive local exchange carrier, Focal Communications Corporation, and the desire of our sales and marketing operations to cross-sell services to the combined customer base, Broadwing has adopted a CPNI Corporate Policy and is implementing the processes and procedures specified in that policy. Until we have completed the implementation of the policy, the company has forbidden its sales and marketing employees from using any CPNI to cross-market and sells Broadwing services across CPNI categories.

Specifically, we have taken the following actions to protect the CPNI of our customers:

- We have adopted a corporate policy on CPNI consistent with the Commission's rules. This policy is posted on the company's intranet on the Corporate Governance page relating to company policies and procedures.
- The company's Code of Conduct requires employees to keep all customer data, including CPNI, confidential. Violations by employees of the CPNI policy constitute violations of the Code of Conduct and can lead to disciplinary action against employees who do not comply with the policy up to and including termination of employment.
- Broadwing has established a database to identify all customers that do not give approval for us to use their CPNI in selling and marketing across categories. We are in the process of notifying all our customers of their CPNI rights by means of an opt-out notice that provides them a toll-free telephone number to call if they wish to restrict us from using their CPNI for these Company marketing purposes.



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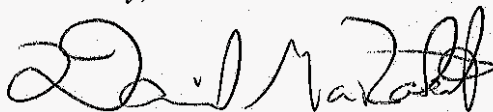
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- In the past, requests from our agents for access to customer information that may have included CPNI have been few and far between. Broadwing's prior policy was not to release any information to its agents without the permission of the customer involved. In addition to continuing that requirement, we are also notifying our agents that in the future, given the possibility of cross-selling of multiple categories of communications-related Broadwing services, we will not release any CPNI unless the agent executes a confidentiality agreement that meets the requirements of 47 CFR 64.2007(b)(2).
- All employees with sales and marketing responsibilities have been directed to review the company's CPNI policy and they have been provided with contact information for the company's regulatory attorneys should they have any questions. Training materials will be provided and training sessions conducted prior to the company engaging in any cross-marketing involving any CPNI.

In summary, Broadwing has established and is implementing operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. If the Bureau has any further questions concerning our compliance with our CPNI obligations, please do not hesitate to contact me.

Sincerely,



David Mace Roberts

DMR/nm



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